

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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PAN AMERICAN AIRWAYS CORP.,)	
)	
Plaintiff)	
)	
v.)	Case No. 04-CV-10515JLT
)	
ROBERT E. BARNES)	
)	
Defendant)	
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DECLARATION OF STEVEN E. LEGERE

I, Steven E. Legere, being first duly sworn, do hereby state as follows:


1. My name is Steven E. Legere. I am employed as the Vice President of Maintenance for Pan American Airways Corp. ("Pan Am"). I have held this position since March of 2004.
2. I hold an Airframe and Powerplant License ("A&P License") issued by the Federal Aviation Administration ("FAA").
3. I am familiar with the circumstances which are the subject of the ongoing litigation in this matter.
4. By FAA regulation, Pan Am is directed to comply with certain requirements related to the maintenance and preservation of its aircraft, including but not limited to aircraft engines. The requirements for engine preservation are set forth in a variety of different publications, including Pan Am's FAA-approved manuals, as well as

the aircraft and engine manufacturers' manuals.

5. I have reviewed a copy of the resume of Pan Am's former Vice President of Maintenance, Mr. Robert Barnes, a copy of which is attached hereto as Exhibit A.

6. I believe that, based upon the extensive level of experience which Mr. Barnes set forth in his resume, and with knowledge of the level of familiarity with aircraft maintenance and preservation procedures which accompanies the position of Vice President of Maintenance for Pan Am, someone in Mr. Barnes' position would know, or should have known, of the existence of the aforementioned aircraft maintenance and preservation requirements, as well as the adverse consequences of failing to adhere to same.

Subscribed under the penalties of perjury this 4th day of October, 2004.


Steven E. Legere

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ROBERT E. BARNES

WORK EXPERIENCE

1990 - 2001 United Airlines Boston, MA.

Manager, Aircraft Maintenance Operations, Boston

- Manage all aspects of aircraft maintenance, stores, and hangar facility.
- Managed growth from 21 flights per day, 7 overnight aircraft, and 9 aircraft mechanics to an operation with 50 flights per day with 17 overnight aircraft and a staff of nearly 150 employees.
- On-site construction manager for new B747-400 hangar facility.

1989-1990

Manager, Aircraft Maintenance Administration, Chicago, O'Hare International Airport

1986 - 1989

Foreman, Aircraft Line Maintenance, Chicago, O'Hare International Airport.

1986 – 1986 Rolls Royce, Inc.

Chicago, IL.

Service Representative, Maintenance

1985 – 1986 All Star Airlines, Inc.

Manchester, NH.

Director of Maintenance

1979 – 1984 Eastern Airlines

Boston, MA.

Foreman, Aircraft Line Maintenance

1976 – 1979

Mechanic, Aircraft Line Maintenance

1975 – 1975 Boeing Military Airplane Company

Wichita, KS.

General Assembler Installer, B52D

1975- 1975 Trans New England Airlines, Inc.

Boston, MA.

Mechanic, Line Maintenance, DC3-C

EDUCATION

1972 - 1974 East Coast Aero Tech Lexington, MA.
Aeronautical Maintenance Technology
■ Airframe and Powerplant License

AWARDS RECEIVED

United Airlines, Nominated in Annual Awards Program for Vision Award, 2000.

United Airlines, Boston Annual Awards Program, Employee of the Year 2000

F.A.A. Certificate of Recognition for Promoting Aviation Education. 1997

Massport Award for FOD Prevention, 1997

F.A.A. Certificate of Recognition for work as President of the Logan Airport Maintenance Managers Council, 1997.

United Airlines, Nominated in Annual Awards Program for Leadership Award, 1996

Career College Association Hall of Fame Inductee, Washington D.C., 1994

United Airlines, Nominated in Annual Awards Program for Creative Solutions Award, 1993.

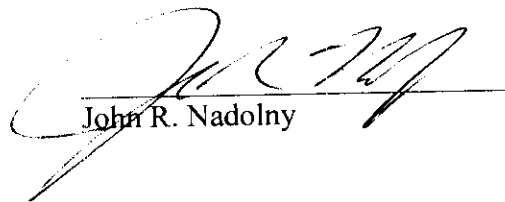
F.A.A., Certificate of Recognition for service as a Member of the Aviation Career Education Academy Staff and Faculty, 1991.

United Airlines, Award of Merit, 1989

Certificate of Service

I, John R. Nadolny, hereby certify that a copy of the foregoing documents were served upon counsel for the Defendant at the address set forth below by sending same via UPS overnight delivery on this 4th day of October, 2004.

Peter Piel, Esq.
800 Turnpike Street
Suite 300
North Andover, MA 01845



John R. Nadolny